

3

MEMORANDUM OF WRIT PETITION
(SPECIAL ORIGINAL JURISDICTION)
(UNDER ART. 226 OF THE CONSTITUTION OF INDIA)

IN THE HIGH COURT FOR THE STATE OF TELANGANA::AT HYDERABAD

W.P. NO.

OF 2019

Between:

- 1.Doravari Dastagiri Reddy,S/o D.Bali Reddy,Age:52yrs,
R/o 30-112b, Revenue Quarter,Nandyal Kurnool,AP
- 2.Doravari LakshmiKurnari,W/o D. Da^tstagiri Reddy,Age:49Yrs,
R/o 30-112b, R/o Revenue Quarter,Nandyal Kurnool,AP
- 3.Doravari Sambasiva Reddy,S/o D.Subba Reddy,Age:58Yrs,
R/o 6-52,Uyyalawada,Kurnool AP.
- 4.Doravari Jayarami Reddy S/o D.Subbareddy,Age:50Yrs,
R/o 6-00,Uyyalavada Kurnool,AP
- 5.Doravari Jagadishwara Reddy,S/o Doravari Subba Reddy,Age:39Yrs,
R/o 6-52,Kota Street ,Uyyalawada,Kurnool,AP ,

..Petitioners

AND

- 1.The State of Telangana,Rep by its Principal Secretary Home,
Secretariate,Hyderabad.
2. The Regional Officer,Central Board of Film Certification,
206, CGO Towers,Kavadiguda,Secunderabad-500080.
3. The Chairperson ,Central Board of Film Certification,
Films Division Complex, Phase- I Building,
9th Floor,Dr. G. Deshmukh Marg Mumbai- 400026.
4. The Regional Officer,Central Board of Film Certification
Shastri Bhavan, 35-Haddows Road, Chennai - 600 006
5. The Regional Officer,Central Board of Film Certification
Films Division Complex, Phase- I Building, 9th Floor,Dr. G. Deshmukh
Marg,Mumbai-400 026
- 6.Konidala Production Company,A Partnership firm,office at Plot No
303N,Road No 75,Jubilee Hills,Hyderabad-500033.
- 7.K.Ram Charan,S/o K.Chiranjeevi,Age about 34Yrs,Occ: Actor Cum Cine
Producer, Managing Partner of Konidala Production Company ,O/o Plot
No 303N,Road No 75,Jubilee Hills,Hyderabad-500033
8. Konide^{la} Siva Sankara Vara Prasad @ Chiranjeevi,S/o Late Ventakat
Rao,Age:63Yrs,Occ:Film Actors
O/o Plot No 303N,Road No 75,Jubilee Hills,Hyderabad-500033
- 9.Patti Surender Reddy,S/o Not Know ,Age:58Yrs,Occ:Director Of
SYERA^A Narasimha Reddy feature film,O/o Plot No 303N,Road No 75,
Jubilee Hills,Hyderabad-500033

4

10.Amita bachan S/o Late Harivansh Rai Bachchan ,Age:76Yrs,Occ:Actor
in SYERAA feature film R/o "Jalsa", B/2, Kapol Housing Society, VL Mehta
Road, Juhu, Mumbai - 400049

..Respondents

The address for service on the above named Petitioners is that of their
counsel JANARDHANA REDDY PONAKA(12565) F 501 BHASKARA
SIGNATURE APARTMENT MODEL COLONY S R NAGAR HYDERBAD-500038
8309409689

For the reasons stated in the accompanying affidavit, it is hereby
prayed that this Hon'ble Court may be pleased to issue an appropriate
Writ, Order or Direction more particularly in the nature of Writ of
Mandamus not issue the film censor certificate for the feature film
SYERAA until the obtaining the consent of the legal heirs with pre view of
entire featur film of freedom feighter Uyylawada Narsimha Reddy which
is the biopic in the name of SYERAA by the 1st,2nd,3rd,4th and 5th
respondents or else the personal rights/liberty/privacy of petitioners over
rided as being illegal, arbitrary and against the principles of natural justice
and violative of provisions The Cinematograph Act, 1952 and Rules, Article
14, 16, 19 (1)(g), 21, 300-A and 301 of The Constitution of India and
consequently direct the 2nd,3rd,4th and 5th respondents to consider the
representation dated 21.09.2019 of personal sentiments of the true story
of biopic of their family members/Legal Heirs and pass such other order or
orders may deem fit and proper in the circumstances of the case.

P. Janardhan
HYDERABAD
DATE: 23.09.2019

Counsel for the Petitioner

HYDERABAD District

IN THE HIGH COURT FOR THE STATE
OF TELANGANA::AT HYDERABAD

W.P. NO.

OF 2019

Doravari Dastagiri Reddy

..Petitioner

AND

The State of Telangana

...Respondent

WRIT PETITION

Filed By:

M/s JANARDHANA REDDY
PONAKA(12565)
Advocate

Counsel for Petitioner

7

IN THE HIGH COURT FOR THE STATE OF TELANGANA::AT HYDERABAD

W.P. NO.

OF 2019

Between:

- 1.Doravari Dastagiri Reddy,S/o D.Bali Reddy,Age:52yrs,
R/o 30-112b, Revenue Quarter,Nandyal Kurnool,AP
- 2.Doravari LakshmiKumari,W/o D. Dastagiri Reddy,Age:49Yrs,
R/o 30-112b, R/o Revenue Quarter,Nandyal Kurnool,AP
- 3.Doravari Sambasiva Reddy,S/o D.Subba Reddy,Age:58Yrs,
R/o 6-52,Uyyalawada,Kurnool AP.
- 4.Doravari Jayarami Reddy S/o D.Subbareddy,Age:50Yrs,
R/o 6-00,Uyyalavada Kurnool,AP
- 5.Doravari Jagadishwara Reddy,S/o Doravari Subba Reddy,Age:39Yrs,
R/o 6-52,Kota Street ,Uyyalawada,Kurnool,AP ,

..Petitioners

AND

- 1.The State of Telangana,Rep by its Principal Secretary Home, Secretariate,Hyderabad.
2. The Regional Officer,Central Board of Film Certification, # 206, CGO Towers,Kavadiguda,Secunderabad-500080.
3. The Chairperson ,Central Board of Film Certification, Films Division Complex, Phase- I Building, 9th Floor,Dr. G. Deshmukh Marg Mumbai- 400026.
4. The Regional Officer,Central Board of Film Certification Shastri Bhavan, 35-Haddows Road, Chennai - 600 006
5. The Regional Officer,Central Board of Film Certification Films Division Complex, Phase- I Building, 9th Floor,Dr. G. Deshmukh Marg,Mumbai-400 026
- 6.Konidala Production Company,A Partnership firm,office at Plot No 303N,Road No 75,Jubilee Hills,Hyderabad-500033.
- 7.K.Ram Charan,S/o K.Chiranjeevi,Age about 34Yrs,Occ: Actor Cum Cine Producer, Managing Partner of Konidala Production Company ,O/o Plot No 303N,Road No 75,Jubilee Hills,Hyderabad-500033
8. Konidela Siva Sankara Vara Prasad @ Chiranjeevi,S/o Late Ventakat Rao,Age:63Yrs,Occ:Film Actors
O/o Plot No 303N,Road No 75,Jubilee Hills,Hyderabad-500033
- 9.Patti Surender Reddy,S/o Not Know ,Age:58Yrs,Occ:Director Of SYERAA Narasimha Reddy feature film,O/o Plot No 303N,Road No 75, Jubilee Hills,Hyderabad-500033

DORAVARI DASTAGIRI REDDY

8

10.Amita bachan S/o Late Harivansh Rai Bachchan ,Age:76Yrs,Occ:Actor
in SYERAA feature film R/o "Jalsa", B/2,Kapol Housing Society, VL Mehta
Road, Juhu, Mumbai - 400049

..Respondents

AFFIDAVIT FILED BY THE 1ST PETITIONER

I, Doravari Dastagiri Reddy,S/o D.Bali Reddy,Age:52yrs,R/o 30-112b,
Revenue Quarter,Nandyal Kurnool,AP, now having temporarily come down
to HYDERABAD, do hereby solemnly and sincerely affirm and state as
follows:

1. I submit that I am the 1st Petitioner herein and as such I am well acquainted with the facts of the case. I am filing this affidavit on behalf of other petitioners as well.
2. I further submit that since the cause of action of all the petitioners herein is one and the same, we are filing a single writ petition. However, as required under writ rules, separate court fee is paid herewith.
3. I humbly submit that Uyyalawada Narasimha Reddy (died 22 February 1847 due to hang by British rulers at Koikonda public place ,Kurnool Dist of AP) was the son of a former Indian Telugu Polygar who was at the heart of a rebellion in 1846, where 5000 peasants rose up against the British East India Company (EIC) in Kurnool district, Rayalaseema Region of Andhra Pradesh . They were protesting changes to the traditional agrarian system introduced by the British in the first half of the nineteenth century . Those changes, which included the introduction of the ryotwari system and other attempts to maximize revenue impacted lower-status cultivators by depleting their crops and leaving them impoverished.
4. I submit that Sye Raa is an upcoming Indian Telugu-language biographical epic action film directed by Surender Reddy and produced

DORAVARI DASTAGIRI REDDY

by Ram Charan under the Konidela Production Company banner. The film will be dubbed and released in Tamil, Kannada, Malayalam and Hindi. The story is based on the life of freedom fighter Uyyalawada Narasimha Reddy from the Rayalaseema region of Andhra Pradesh. The film stars Chiranjeevi in the title role along with a supporting cast that consists of Sudeep, Vijay Sethupathi, Nayanthara, Tamannaah, Jagapati Babu and Niharika Konidela in lead roles. Amitabh Bachchan will make a guest appearance. Filming began in Hyderabad on 6 December 2017. The film is scheduled to be released theatrically worldwide on 2 October 2019.

5. I submit that we 22 persons are the Legal heirs of the Uyyalawada Narashima Reddy family from Kurnool dist. The Producer of the feature film approached us on 02.08.2018 through ABN Channel in LIVE Telecast and requested to enter an agreement since we are the Original Legal Heirs of Bopic of Uyyalawada Narashima Reddy Feature Film So called Syeraa. By believing the words , 22 members of Uyyalawada Narshima Reddy Met the producer namely Ram Charan at his residence on 20.08.2018 and He Promised us orally he will Provide all regal claim for use of our family history and places like our house and other articles, literature of Uyyala Narsimhareddy before theatrical trailer. They collected the real story along with the available written biopic and showing the places of Vuyyala Narashima reddy life period with available material and archeology items we never give any consent in writing they only promised that a claim will be given to only these 22 Legal heir on or before 16.08.2019 .

6. On 13.03.2019 called all our legal heirs to Hyderabad and gave Rs.25,000/- as travel expenses by the producer and informed the Cinema came to end of shoot , hence a written agreement was essential meet the claim. On 11th May it was informed by them that an agreement is ready we all are to sign to get the claim as agreed and promised by producer(orally it was 10 Percent of cost of film). Accordingly we all

DORAVARI DASTAKIRIREDDY

signed in bond paper believing the words of Producer and film unit for getting rightful claim as decided by them in usage of our fore father story and the help rendered in getting the film to succeed in right way .

7. I submit that it was informed by the Film Unit to meet on 08.08.2018 at their office, accodingly we approached on 08.08.2018, but they refused to meet us from morning to evening and suddenly they sent us to Goshamal Stadium with help of police and left us at 10PM without any explanation and threaten us with dire consequence if they come again to our office or residence in future.

8. I submit that Due to innocence and lack of legal knowledge we left Hyderabad and reached our Native and again on 16.09.2018 we try to met the Producer in their office but again they sent us to Police station .

9. I submit that we came to know that they all cheated us by inducement, dishonestly with false promise and mis trust by physically and mentally harassing with goons and political pressure. They all threaten us with dire consequences of life threat and if we have any claim they will finish us physically. We have all photographs of our meetings with producer and film unit .

10. I submit that we came to know in a press meet on 20.09.2019 Producer informed that he cannot give any claim to the legal Heirs .

11. I submit that we realized that we got cheated by the all Private Respondents Cheating with criminal breach of trust with threat of killing us if we claim any claim as promised by them in future or if we made any court case in this regard of feature film of Syeraa Narsimha Reddy which is going to release on 02.10.2019.

12. I submit that this is real story based feature film as biopic of Uyyalawada Narsimha Reddy where an concern and family acceptance is essential ,but the film Producer never took our written consent or acceptance except a written word in bond claim is given on or before 16.08.2019 .

DORAUARI DASTAGIRIREDDY

11

13. We humbly submit that we have all rights on our family member real story any person without our consent and will cannot go ahead with public shoot and make a feature film which is against to the The Cinematograph Act, 1952 and Rules.

14. I submit that Our personal sentiments/privacy (in Telugu MANOBHAVULU) is the most important under the Constitution of India, no one can over ride or take away our personal liberty .

15. I submit that on 21.09.2019 we approached the Censor Board is that the Produce must get our written consent after arranging the pre view of feature film before censor certification and we came to known that a certificate can be issued within 2days.

16. I submit that We also demand any objection of legal heir and miss carriage of real story must be censored without exhibiting to public. Hence it is prayed and requested to stop the censor certification of our family history until our consent and acceptance which against to The Cinematograph Act, 1952 and Rules.

17. In the circumstances stated above, the petitioner has no efficacious alternative remedy, except to seek the redressal before this Hon'ble Court seeking the indulgence of this Hon'ble Court to exercise the extraordinary original jurisdiction vested in this Hon'ble Court by virtue of Article 226 of the Constitution of India. The petitioner has not filed any writ petition, suit or other proceedings for the relief or relieves sought herein.

18. It is therefore prayed that this Hon'ble Court may be pleased to issue an appropriate Writ, Order or Direction more particularly in the nature of Writ of Mandamus not issue the film censor certificate for the feature film SYERAA until the obtaining the consent of the legal heirs with pre view of entire featur film of freedom feighter Uyylawada Narsimha Reddy which

DORAVARI DASTANI RIZZIE REDDY

✓

is the biopic in the name of SYERAA by the 1st,2nd,3rd,4th and 5th respondents or else the personal rights/liberty/privacy of petitioners overrided as being illegal, arbitrary and agairist the principles of natural justice and violative of provisions The Cinematograph Act, 1952 and Rules, Article 14, 16, 19 (1)(g), 21, 300-A and 301 of The Constitution of India and consequently direct the 2nd,3rd,4th and 5th respondents to consider the representation dated 21.09.2019 of personal sentiments of the true story of biopic of their family members/Legal Heirs and pass such other order or orders may deem fit and proper in the circumstances of the case.

19. It is also just and necessary that this Hon'ble Court may be pleased to direct the 1st, 2nd,3rd,4th and 5th respondents to stay the film censor certificate of feature film SYERAA without considering the personal sentiments/personal liberty/privacy of the true story of biopic of their family members/Legal Heirs pending disposal of the above writ petition and pass such other order or orders may deem fit and proper in the circumstances of the case.

last page corrs.

Solemnly and sincerely affirm this
the day of 23.09.2019
and signed his name in my presence.

DORAUARI DASTABILIZED
Deponent

BEFORE ME

ADVOCATE :: HYDERABAD

13

VERIFICATION STATEMENT

I, Doravari Dastagiri Reddy,S/o D.Bali Reddy,Age:52yrs,R/o 30-112b,
Revenue Quarter,Nandyal Kurnool,AP, being the petitioner/ person
acquainted with the facts do hereby verify and state that the contents of
the above paras of the Affidavit are true and correct to the best of my
knowledge. The above contents are typed under my instructions and
same are read over and explained to me in vernacular language. Hence
verified at HYDERABAD on this the day of .09.2019

ADVOCATE

DORAVARI DASTAGIRI REDDY
DEPONENT

3

MEMORANDUM OF WRIT PETITION
(SPECIAL ORIGINAL JURISDICTION)
(UNDER ART. 226 OF THE CONSTITUTION OF INDIA)

IN THE HIGH COURT FOR THE STATE OF TELANGANA::AT HYDERABAD

W.P. NO.

OF 2019

Between:

- 1.Doravari Dastagiri Reddy,S/o D.Bali Reddy,Age:52yrs,
R/o 30-112b, Revenue Quarter,Nandyal Kurnool,AP
- 2.Doravari LakshmiKurnari,W/o D. Da~~s~~ttagiri Reddy,Age:49Yrs,
R/o 30-112b, R/o Revenue Quarter,Nandyal Kurnool,AP
- 3.Doravari Sambasiva Reddy,S/o D.Subba Reddy,Age:58Yrs,
R/o 6-52,Uyyalawada,Kurnool AP.
- 4.Doravari Jayarami Reddy S/o D.Subbareddy,Age:50Yrs,
R/o 6-00,Uyyalavada Kurnool,AP
- 5.Doravari Jagadishwara Reddy,S/o Doravari Subba Reddy,Age:39Yrs,
R/o 6-52,Kota Street ,Uyyalawada,Kurnool,AP ,

..Petitioners

AND

- 1.The State of Telangana,Rep by its Principal Secretary Home,
Secretariate,Hyderabad.
2. The Regional Officer,Central Board of Film Certification,
206, CGO Towers,Kavadiguda,Secunderabad-500080.
3. The Chairperson ,Central Board of Film Certification,
Films Division Complex, Phase- I Building,
9th Floor,Dr. G. Deshmukh Marg Mumbai- 400026.
4. The Regional Officer,Central Board of Film Certification
Shastri Bhavan, 35-Haddows Road, Chennai - 600 006
5. The Regional Officer,Central Board of Film Certification
Films Division Complex, Phase- I Building, 9th Floor,Dr. G. Deshmukh
Marg,Mumbai-400 026
- 6.Konidala Production Company,A Partnership firm,office at Plot No
303N,Road No 75,Jubilee Hills,Hyderabad-500033.
- 7.K.Ram Charan,S/o K.Chiranjeevi,Age about 34Yrs,Occ: Actor Cum Cine
Producer, Managing Partner of Konidala Production Company ,O/o Plot
No 303N,Road No 75,Jubilee Hills,Hyderabad-500033
8. Konidela Siva Sankara Vara Prasad @ Chiranjeevi,S/o Late Ventakat
Rao,Age:63Yrs,Occ:Film Actors
O/o Plot No 303N,Road No 75,Jubilee Hills,Hyderabad-500033
- 9.Patti Surender Reddy,S/o Not Know ,Age:58Yrs,Occ:Director Of
SYERAA Narasimha Reddy feature film,O/o Plot No 303N,Road No 75,
Jubilee Hills,Hyderabad-500033

4

10.Amita bachan S/o Late Harivansh Rai Bachchan ,Age:76Yrs,Occ:Actor
in SYERAA feature film R/o "Jalsa", B/2, Kapol Housing Society, VL Mehta
Road, Juhu, Mumbai - 400049

..Respondents

The address for service on the above named Petitioners is that of their
counsel JANARDHANA REDDY PONAKA(12565) F 501 BHASKARA
SIGNATURE APARTMENT MODEL COLONY S R NAGAR HYDERBAD-500038
8309409689

For the reasons stated in the accompanying affidavit, it is hereby
prayed that this Hon'ble Court may be pleased to issue an appropriate
Writ, Order or Direction more particularly in the nature of Writ of
Mandamus not issue the film censor certificate for the feature film
SYERAA until the obtaining the consent of the legal heirs with pre view of
entire featur film of freedom feighter Uyylawada Narsimha Reddy which
is the biopic in the name of SYERAA by the 1st,2nd,3rd,4th and 5th
respondents or else the personal rights/liberty/privacy of petitioners over
rided as being illegal, arbitrary and against the principles of natural justice
and violative of provisions The Cinematograph Act, 1952 and Rules, Article
14, 16, 19 (1)(g), 21, 300-A and 301 of The Constitution of India and
consequently direct the 2nd,3rd,4th and 5th respondents to consider the
representation dated 21.09.2019 of personal sentiments of the true story
of biopic of their family members/Legal Heirs and pass such other order or
orders may deem fit and proper in the circumstances of the case.

P. Faruq Ali

Counsel for the Petitioner

HYDERABAD
DATE: 23.09.2019

QH41930972

HYDERABAD District

IN THE HIGH COURT FOR THE STATE
OF TELANGANA::AT HYDERABAD

W.P. NO. OF 2019

Doravari Dastagiri Reddy
..Petitioner

AND

The State of Telangana
...Respondent

WRIT PETITION

Filed By:

M/s JANARDHANA REDDY
PONAKA(12565)
Advocate

Counsel for Petitioner